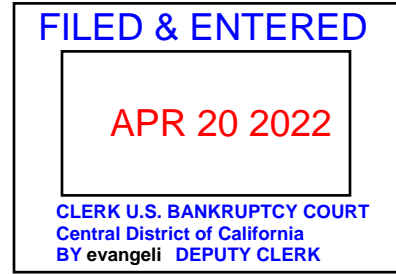


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Attorneys for Chapter 11  
Debtor and Debtor in Possession



**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION**

In re: ) Case No.: 2:22-bk-10266-BB  
)  
ESCADA AMERICA LLC, ) Chapter 11 Case  
) Subchapter V  
Debtor and Debtor in Possession. )  
) **ORDER APPROVING STIPULATION**  
) **TO EXTEND DEADLINES AND**  
) **SCHEDULING REGARDING:**  
)  
) **(1) DEBTOR'S MOTION FOR ORDER:**  
) **(I) AUTHORIZING USE OF CASH**  
) **COLLATERAL PURSUANT TO**  
) **SECTION 363 OF THE BANKRUPTCY**  
) **CODE; AND (II) APPROVING**  
) **ADEQUATE PROTECTION [ECF 101];**  
)  
) **(2) OBJECTION OF SIMON**  
) **PROPERTY GROUP AND**  
) **BROOKFIELD PROPERTIES RETAIL**  
) **TO DEBTOR'S SUBCHAPTER V**  
) **ELECTION OR, ALTERNATIVELY,**  
) **MOTION FOR APPOINTMENT OF AN**  
) **OFFICIAL COMMITTEE OF**  
) **UNSECURED CREDITORS [ECF 103];**  
) **AND**  
)  
) **(3) CREDITOR 717 GFC LLC'S (1)**  
) **JOINDER TO OBJECTION OF SIMON**  
) **PROPERTY GROUP AND**  
) **BROOKFIELD PROPERTIES RETAIL**  
) **TO DEBTOR'S SUBCHAPTER V**  
) **ELECTION OR, ALTERNATIVELY,**  
) **MOTION FOR APPOINTMENT OF AN**  
) **OFFICIAL COMMITTEE OF**  
) **UNSECURED CREDITORS, AND (2)**

) **LIMITED OBJECTION TO USE OF**  
) **CASH COLLATERAL [ECF 111]**  
) Hearing:  
) Date: April 27, 2022  
) Time: 10:00 a.m.  
) Place: Courtroom 1539  
) 255 East Temple Street  
) Los Angeles, CA 90012  
)  
) Hearing to be held in-person and by video-  
) conference Government Zoom, see Court's  
) website under "Telephonic Instructions" for  
) more details:  
) <https://www.cacb.uscourts.gov/judges/honorable-sheri-bluebond>  
)  
)

The Court, having read and considered that certain Stipulation to Extend Deadlines and Scheduling Regarding: (I) Motion for Order (I) Authorizing Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code; and (II) Providing Adequate Protection [ECF 101], and (II) Objection of Simon Property Group and Brookfield Properties Retail to Debtor's Subchapter V Election or, Alternatively, Motion for Appointment of an Official Committee of Unsecured Creditors [ECF 103] (the "Stipulation") entered into, through counsel, by and between Escada America LLC, a Delaware limited liability company, (the "Debtor"), the debtor and debtor in possession in the above-captioned chapter 11, subchapter V bankruptcy case, on the one hand, and creditors Brookfield Properties Retail, Inc., Simon Property Group, Inc., and certain of their respective affiliates (collectively, the "Creditors") and 717 GFC LLC ("GFC"), on the other hand, the record in this case, the docket in this case, and good cause appearing therefor,

**IT IS HEREBY ORDERED** as follows:

1. The Stipulation is approved.
2. The hearing on the Motion for Order (I) Authorizing Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code; and (II) Providing Adequate Protection (the "Cash Collateral Motion") [ECF 101] and the objections thereto on April 27, 2022, at 10:00

1 a.m. will be an interim hearing, with a further hearing set for May 11, 2022, at 10:00 a.m. (the  
2 “Further Hearing”).

3 3. The Debtor’s deadline to file a reply in support of the Cash Collateral Motion is  
4 extended to the date that is 7 days prior to the Further Hearing.

5 4. The hearing on the Objection of Simon Property Group and Brookfield Properties  
6 Retail to Debtor’s Subchapter V Election or, Alternatively, Motion for Appointment of an  
7 Official Committee of Unsecured Creditors (the “Election/Committee Motion”) [ECF 103],  
8 Creditor 717 GFC LLC’s (1) Joinder to Objection of Simon Property Group and Brookfield  
9 Properties Retail to Debtor’s Subchapter V Election or, Alternatively, Motion for Appointment  
10 of an Official Committee of Unsecured Creditors, and (2) Limited Objection to Use of Cash  
11 Collateral (the “Joinder”) [ECF 111], and any responses thereto on April 27, 2022, at 10:00 a.m.,  
12 is continued to and rescheduled concurrently with the Further Hearing.

13 5. The deadline for the Creditors and GFC to file a reply in support of the  
14 Election/Committee Motion and Joinder is extended to the date that is 7 days prior to the Further  
15 Hearing.

16 6. At the status conference on April 27, 2022, the Debtor, Creditors, and GFC may  
17 jointly request that the status conference be continued concurrently with the Further Hearing.

18 7. At the status conference on April 27, 2022, the Debtor, Creditors, and GFC may  
19 jointly request that the Court extend the Debtor’s deadline to file a subchapter V plan under 11  
20 U.S.C. § 1189(b) from May 2, 2022, to May 16, 2022, without prejudice to further extension,  
21 and without prejudice to the relief sought by the Election/Committee Motion and Joinder.

22  
23  
24 Date: April 20, 2022



Sheri Bluebond  
United States Bankruptcy Judge

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Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION**

In re:

ESCADA AMERICA LLC,

Debtor and Debtor in Possession.

) Case No.: 2:22-bk-10266-BB

)

) Chapter 11 Case

) Subchapter V

)

) **ORDER APPROVING STIPULATION  
TO EXTEND DEADLINES AND  
SCHEDULING REGARDING:**

)

) **(I) DEBTOR'S MOTION FOR ORDER:  
(I) AUTHORIZING USE OF CASH  
COLLATERAL PURSUANT TO  
SECTION 363 OF THE BANKRUPTCY  
CODE; AND (II) APPROVING  
ADEQUATE PROTECTION [ECF 101];**

)

) **(II) OBJECTION OF SIMON  
PROPERTY GROUP AND  
BROOKFIELD PROPERTIES RETAIL  
TO DEBTOR'S SUBCHAPTER V  
ELECTION OR, ALTERNATIVELY,  
MOTION FOR APPOINTMENT OF AN  
OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS [ECF 103];  
AND**

)

) **(III) CREDITOR 717 GFC LLC'S (1)  
JOINDER TO OBJECTION OF SIMON  
PROPERTY GROUP AND  
BROOKFIELD PROPERTIES RETAIL  
TO DEBTOR'S SUBCHAPTER V  
ELECTION OR, ALTERNATIVELY,  
MOTION FOR APPOINTMENT OF AN  
OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS, AND (2)**

) **LIMITED OBJECTION TO USE OF**  
) **CASH COLLATERAL [ECF 111]**

) Hearing:

) Date: April 27, 2022

) Time: 10:00 a.m.

) Place: Courtroom 1539

) 255 East Temple Street

) Los Angeles, CA 90012

) Hearing to be held in-person and by video-  
) conference Government Zoom, see Court's  
) website under "Telephonic Instructions" for  
) more details:

) <https://www.cacb.uscourts.gov/judges/honorable-sheri-bluebond>

The Court, having read and considered that certain Stipulation to Extend Deadlines and Scheduling Regarding: (I) Motion for Order (I) Authorizing Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code; and (II) Providing Adequate Protection [ECF 101], and (II) Objection of Simon Property Group and Brookfield Properties Retail to Debtor's Subchapter V Election or, Alternatively, Motion for Appointment of an Official Committee of Unsecured Creditors [ECF 103] (the "Stipulation") entered into, through counsel, by and between Escada America LLC, a Delaware limited liability company, (the "Debtor"), the debtor and debtor in possession in the above-captioned chapter 11, subchapter V bankruptcy case, on the one hand, and creditors Brookfield Properties Retail, Inc., Simon Property Group, Inc., and certain of their respective affiliates (collectively, the "Creditors") and 717 GFC LLC ("GFC"), on the other hand, the record in this case, the docket in this case, and good cause appearing, therefor,

**HEREBY ORDERS AS FOLLOWS:**

1. The Stipulation is approved.
2. The hearing on the Motion for Order (I) Authorizing Use of Cash Collateral Pursuant to Section 363 of the Bankruptcy Code; and (II) Providing Adequate Protection (the "Cash Collateral Motion") [ECF 101] and the objections thereto on April 27, 2022, at 10:00

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6 Retail to Debtor's Subchapter V Election or, Alternatively, Motion for Appointment of an  
7 Official Committee of Unsecured Creditors (the "Election/Committee Motion") [ECF 103],  
8 Creditor 717 GFC LLC's (1) Joinder to Objection of Simon Property Group and Brookfield  
9 Properties Retail to Debtor's Subchapter V Election or, Alternatively, Motion for Appointment  
10 of an Official Committee of Unsecured Creditors, and (2) Limited Objection to Use of Cash  
11 Collateral (the "Joinder") [ECF 111], and any responses thereto on April 27, 2022, at 10:00 a.m.,  
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14 Election/Committee Motion and Joinder is extended to the date that is 7 days prior to the Further  
15 Hearing.

16 6. At the status conference on April 27, 2022, the Debtor, Creditors, and GFC may  
17 jointly request that the status conference be continued concurrently with the Further Hearing.

18 7. At the status conference on April 27, 2022, the Debtor, Creditors, and GFC may  
19 jointly request that the Court extend the Debtor's deadline to file a subchapter V plan under 11  
20 U.S.C. § 1189(b) from May 2, 2022, to May 16, 2022, without prejudice to further extension,  
21 and without prejudice to the relief sought by the Election/Committee Motion and Joinder.

22 **SO ORDERED.**

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1 AGREED AS TO FORM:

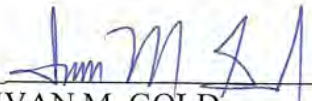
2 Dated: April 19, 2022

ESCADA AMERICA LLC

3 By: /s/ John-Patrick M. Fritz  
4 JOHN-PATRICK M. FRITZ  
5 LEVENE, NEALE, BENDER,  
6 YOO & GOLUBCHIK L.L.P.  
7 Attorneys for Chapter 11  
Debtor and Debtor in Possession

8 Dated: April 19, 2022


BROOKFIELD PROPERTIES RETAIL, INC., SIMON  
PROPERTY GROUP, INC., AND CERTAIN OF THEIR  
RESPECTIVE AFFILIATES

9  
10 By:   
11 IVAN M. GOLD  
12 ALLEN MATKINS LECK GAMBLE MALLORY &  
13 NATSIS LLP

14 Attorneys for Brookfield Properties Retail, Inc., Simon  
15 Property Group, Inc., and Certain of their Respective  
Affiliates

16 Dated: April 19, 2022

717 GFC LLC

17  
18 By:   
19 JOHN C. CANNIZARO  
20 ALYSON M. FIEDLER  
ICE MILLER LLP

21 Attorneys for 717 GFC LLC  
22  
23  
24  
25  
26  
27  
28

1 AGREED AS TO FORM:

2 Dated: April 19, 2022

ESCADA AMERICA LLC

3

By: /s/ John-Patrick M. Fritz

4

JOHN-PATRICK M. FRITZ  
LEVENE, NEALE, BENDER,  
YOO & GOLUBCHIK L.L.P.

5

6

Attorneys for Chapter 11  
Debtor and Debtor in Possession

7

8 Dated: April 19, 2022

BROOKFIELD PROPERTIES RETAIL, INC., SIMON  
PROPERTY GROUP, INC., AND CERTAIN OF THEIR  
RESPECTIVE AFFILIATES

9

10

11

By: \_\_\_\_\_  
IVAN M. GOLD

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Property Group, Inc., and Certain of their Respective  
Affiliates

15

16

Dated: April 19, 2022

717 GFC LLC

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ICE MILLER LLP

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Attorneys for 717 GFC LLC

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